

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)	
)	
Plaintiff,)	
)	Civil Action File
v.)	No. 1:20-cv-05233-SEG
)	
NORTHBROOK INDUSTRIES, INC.,)	
d/b/a UNITED INN AND SUITES,)	
)	
Defendant.)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
PROPOSED REQUESTS TO CHARGE AND
MEMORANDUM IN SUPPORT**

COME NOW Plaintiff J.G. (“Plaintiff”) and Defendant Northbrook Industries, Inc., d/b/a United Inn & Suites (“Defendant”), by and through their respective counsel of record, and hereby jointly move the Court for an order extending the deadline to file their proposed requests to charge.

The current deadline for filing the proposed requests to charge is March 26, 2025. [Dkt. #145] The parties respectfully request an extension in light of the continuation of the April 14, 2025 trial date. The parties request that the deadline for filing proposed requests to charge be extended to 21 days prior to the new trial date, or to such other date as the Court deems appropriate. A proposed order is attached.

L.R. 7.1(D) CERTIFICATION

The undersigned counsel hereby certify that this filing has been prepared in Times New Roman (14 point), which are font and point selections approved by the Court in L.R. 5.1(C).

Respectfully submitted,

/s/ David H. Bouchard

David H. Bouchard
Georgia Bar No. 346750
FINCH McCRANIE, LLP
225 Peachtree Street N.E.
1700 South Tower
Atlanta, Georgia 30303
Telephone: (404) 658-9070
Facsimile: (404) 688-0649
david@finchmccranie.com

Attorney for Plaintiff J.G.

/s/ Dana M. Richens

Dana M. Richens
Georgia Bar No. 604429
SMITH, GAMBRELL & RUSSELL, LLP
1105 W. Peachtree NE, Suite 1000
Atlanta, Georgia 30309
Telephone: (404) 815-3659
Facsimile: (404) 685-6959
drichens@sgrlaw.com

Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED REQUESTS TO CHARGE AND MEMORANDUM IN SUPPORT** via the Court's CM/ECF electronic filing system, which will automatically provide notice of filing constituting service to all counsel of record.

This 25th day of March, 2025.

/s/ Dana M. Richens